

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**KIMBERLEY OWEN,  
INDIVIDUALLY, AND ON BEHALF  
OF OTHERS SIMILARLY SITUATED**

NO. 4:07-cv-03273

**Plaintiff**

## JURY DEMANDED

V.

## HARRIS COUNTY, TEXAS

**Defendant**

**PLAINTIFF'S AMENDED EXHIBIT LIST**

TAB	DESCRIPTION	Offered	Objection	Admitted	N/Admitted
1.	Harris County Precinct 5 letters of commendation regarding Kimberley Owen (Harris County 00506-00518; 00534-00549)		✓	5/18	
2.	Kimberley Owen's EEOC Charge re: Harris County Precinct 5 (Owen 017)		✓		5/18
3.	U.S. Department of Justice Notice of Right to Sue re: Kimberley Owen (Owen 001)			5/18	
4.	Harris County employment policies and procedures (including General Order 200-3)		✓	5/18	
5.	State of Texas criminal prosecution of Romeo Chapa, II for felony (case number 118815101010)		✓		5/18
6.	Harris County Precinct 5 employment records (including IAD file) of Kevin Cooke (Harris County 02162 – 02164; 02614-02615)		✓		5/18
7.	Harris County Precinct 5 employment records of James Paul Cessna			5/19	

TAB	DESCRIPTION	Offered	Objection	Admitted	N/Admitted
	(including employment application) and Order of Expunction				
8.	Harris County Precinct 5 employment records (including IAD file and County 3/7/01 dispatch records) of Ronald Troy Ziesmer (Harris County 05344 – 05346)		✓	5/18	
9.	Harris County Precinct 5 employment records (including IAD file) of Ray Neal (Harris County 01464 – 01465)		✓		5/18
10.	Montgomery County's business records affidavit and Motion to Dismiss and Order in <i>State of Texas v. Kimberley Ann Owen</i> , No. 06-215785 (Harris County 00612 – 00613)		✓	5/18	
11.	Deposition of Dr. Jeffrey Kelley Page 5, lines 10-24; Page 6, line 2-page 7, line 10; Page 8, line 7 to Page 9, line 10; Page 9, lines 15-24; Page 10, line 10 to Page 12, line 12; Page 13, lines 7-25; Page 14, lines 12-13; Page 14, line 19 to Page 17, line 16; Page 17, line 23 to Page 18, line 5; Page 41, lines 13-16; page 44, line 14 to page 46, line 10; page 47, lines 15 to page 49, line 8; Page 50, line 19 to page 51, line 7; Page 51, lines 19-24; Page 54, line 14 to page 55, line 6		✓		5/18
12.	Dr. Jonathan Morris' medical records regarding Kimberley Owen (Owen 098 – 122; Owen 138-139)		✓	5/18	
13.	Kimberley Owen's pay records (W-2) from Vetco Gray, Inc. (Owen 123-124; 135)			5/18	
14.	Harris County's 2009 pay scale for Precinct 5 Deputy Constables (Owen 134)		✓		5/18
15.	Montgomery County 2/26/06 videotape of Kimberley Owen			5/18	
16.	Kimberley Owen's notes of incidents involving Captain Terry Thurman (Owen 039-044)			5/18	
17.	2/26/06 cell phone records of		✓	5/18	

*Glen Cheek*

TAB	DESCRIPTION	Offered	Objection	Admitted	N/Admitted
	Laine (Harris County 04657 – 04658)				
18.	Harris County Retirement System Member Account Statement (Owen 136 – 137)			5/18	
19.	Precinct 5 Drug and Alcohol Screening Procedure (Harris County 00839 – 00847)		✓		5/18
20.	Owen F-5/T-1 Report (Harris County 00123; 00139)			5/18	
21.	Owen Promotion to Lieutenant II (Harris County 00146)			5/18	
22.	Summary of Benefits (Harris County 00776)			5/18	
23.	Deposition of Jimmy Lee Kellum, Jr. Page 9, line 15 to page 11 line 18; Page 12, lines 15-24; Page 13, lines 5-17; Page 13, line 24 to Page 15, line 10; Page 15, lines 15-23, Page 16, line 4 to Page 20, line 7; Page 20, line 24 to Page 22, line 14; Page 22, lines 18-20; Page 23, line 6 to Page 24, line 20; Page 25, line 19 to Page 27, line 23; Page 28, lines 9-18; Page 29, lines 1-8; Page 29, line 25 to Page 30, line 23; Page 33, line 24 to Page 34, line 6; Page 40, lines 13-18; Page 53, lines 1-7		✓		5/18

Respectfully submitted,

**/s/ Scott Newar**

---

SCOTT NEWAR  
State Bar Number 14940900  
700 Louisiana, 25th Floor  
Houston, Texas 77002  
(713) 226-7950  
(713) 226-7181 (Fax)  
ATTORNEY-IN-CHARGE  
FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that I served the instant pleading on Defendant, through its legal counsel, by e-filing on April 30, 2009.

**/s/ Scott Newar**

---

SCOTT NEWAR  
State Bar Number 14940900  
700 Louisiana, 25th Floor  
Houston, Texas 77002  
(713) 226-7950  
(713) 226-7181 (Fax)  
ATTORNEY-IN-CHARGE  
FOR PLAINTIFF